

RECEIVED

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
20TH DIVISION

APR 04 2023

U.S. District Court  
Middle District of TN

VAUGHN HARRIS  
(Name) 578087  
(Prison Id. No.)  
All Pretrial and Inmate Prisoners  
Held In the RHD cells of  
The Davidson County Detention Center  
(Name) DOWNTOWN  
(Prison Id. No.) Unknown  
Plaintiff(s)  
v. The Metropolitan Government  
of Nashville and Davidson County,  
TENNESSEE, The Davidson County Sheriff,  
The (Name) D.I.S.O. Medical Care Department  
Correct Care Solutions and Dr Africa,  
And 3 other Dentist  
Defendant(s)

(List the names of all the plaintiffs filing  
this lawsuit. Do not use "et al." Attach  
additional sheets if necessary.)

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's Office.  
Do not write in this space.)

JURY TRIAL REQUESTED  YES  NO

(List the names of all defendants  
against whom you are filing this  
lawsuit. Do you use "et al." Attach  
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED  
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: VAUGHN HARRIS  
Prison I.D. No. of the first plaintiff: 578087  
Address of the first plaintiff: D.I.S.O. PRISON, P.O. Box 196383,  
Nashville, TN 37219 (Downtown Detention Center Prison)

Status of Plaintiff: CONVICTED  PRETRIAL DETAINEE

2. Name of the second plaintiff: All Pretrial and Posttrial RHD inmates  
Prison I.D. No. of the second plaintiff: Unknown (Requested)  
Address of the second plaintiff: D.I.S.O. PRISON, P.O. Box 196383  
Nashville, TN 37219 (Downtown Detention Center Prison)

Status of Plaintiff: CONVICTED  PRETRIAL DETAINEE

Revised 11/2014

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought: The Metropolitan Government of Nashville and Davidson County, Tennessee, and the

1. Name of the first defendant: Nashville, Tennessee Legislature

Place of employment of the first defendant: Tennessee State Capital Bldg.

1st Floor, 600 Charlotte Ave, Nashville, TN 37243

First defendant's address: Tennessee State Capital Bldg. 1st Floor,  
600 Charlotte Ave, Nashville, TN 37243

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

<sup>2nd</sup> Defendant: Governor Bill Lee

2. Name of the second defendant: THOMAS CONRAD, CARLA Joseph

Place of employment of the second defendant: The D.C.S.O. Downtown Detention Center Prison, 200 James Robertson Pkwy, Nashville, TN 37201

Second defendant's address: 200 James Robertson Pkwy, Nashville, TN 37201 or D.C.S.O. P.O. Box 196383, Nashville, TN 37219

All defendants are being sued in both capacities below:

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

<sup>2nd</sup> Defendant: GRANVILLE EARL

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

## II. JURISDICTION

A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).  
- Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below: under 42 U.S.C. § 1985

2A

THESE ARE THE DEFENDANTS TO THIS LAWSUIT. THE FOLLOWS, VAUGHN HARRIS, AND DEFENDANTS LISTED BELOW AND ON NEXT PAGE'S AGAINST METRO, ETC. 5/16

1. The Metropolitan Government of Nashville and Davidson County, Tennessee (pg 28)
2. City of Nashville, Tennessee 26. JAMIE JOHNSON 28. DARON HALL Sheriff
3. Correct Care Solutions 27. RUBY JOYNER 29. C. ROBINSON
4. MELINDA STEPHENS 28. TYLER SAGGS 50. E HIGGINS
5. DR KRISTAL LEWIS 29. PATRICE MAYBERRY 51. JACOB BIANCHI
6. JENNY JAYNES 30. T. J. PRIMM 52. JENNIFER COBBS
7. TOM WEBB 31. AUSTIN DALE 53. A. BUCHANAN
8. JEANETTE PAGE 32. T. HINDSLEY 54. MELISSA HICKS
9. JAN REBAR 33. CLARK SARGENT 55. RUIZGE
10. AARON CASKEY 34. SEAN BEACH 56. <sup>CORRECT CARE SOLUTIONS</sup> METRO MEDICAL <sup>AGENTS</sup> AGENTS AND EMPLOYEES AND STAFF - etc. etc.
11. MICHELLE RAGLAND 35. M. GRAULAU 58. <sup>THE METRO MEDICAL AGENTS</sup> STAFF - etc. etc.
12. APRIL MCQUEEN 36. M. HEDGWOD 92. REVENUE SHAVON
13. LOREENA WILLIAMS 37. ANNALISA SMITH 97. CANDY HILL
14. JEFF (LAST NAME UNKNOWN) 38. NICHOLAS PALLAK 98. DR AFRICA
15. AUSTIN Bodie 39. DAVID BRYANT 102. C. MACKY
16. DARON HALL Sheriff 40. THOMAS CONRAD 598 thru 130
17. CATHERINE FITZWATER 41. JERRY RAMSEY Some <sup>DEFENDANTS</sup> FIRST NAMES WILL
18. KENITA THOMAS 42. RICHARD GRANT HAVE TO BE DISCOVERED
19. M. JONES 43. T. DIAL BY PLAINTIFF'S LEGAL COUNSEL
20. JUSTIN WEBB 44. S. PRICE BECAUSE THE DEFENDANTS
21. KEIANA BURGESS 45. SARA VARDELL WOULD HIDE THEIR NAMES.
22. BRIAN EICHSTAEDT 46. A. BURGESS MANY TIMES UNDER
23. RONNIE DAVIS 47. JAMES HENDRY "METRO" CUSTOM
24. DEBRA DIXON 48. MICHAEL MARTINEZ D.C.S.O. P.O. BOX 19638, NASHVILLE, TN 37217
25. GRANISSE EARL 49. CHRIS BROWN C.C.S.

56 thru 98<sup>thru</sup> DAVIDSON COUNTY SHERIFF'S OFFICE PRETRIAL PRISON MEDICAL AGENTS EMPLOYED IN AND METRO NASHVILLE, TN DEC 5, 2013 AND ASSISTANCE BY CORRECT CARE SOLUTIONS FOR THE DAVIDSON COUNTY

All defendants are being sued in their individual and official capacities. All are employees or agents of the Davidson County Sheriff's Office, 448 2nd Ave North, Nashville, TN, or D.C.S.O. or METRO MEDICAL AGENTS EMPLOYED BY THE D.C.S.O. AND METRO, by Correct Care Solutions, 1283 MURFREESBORO ROAD, SUITE 500, NASHVILLE, TN 37217, AND DR. KRISTAL LEWIS AND JENNY JAYNES - DENTAL CARE AGENTS OF CORRECT CARE SOLUTIONS, 2014 thru 2019, FOR THE METRO, DAVIDSON COUNTY SHERIFF'S OFFICE PRETRIAL PRISON FROM 2014 THRU 2019. ALL CAN BE GIVEN SUMMONS AT THE DAVIDSON COUNTY SHERIFF'S OFFICE PRETRIAL PRISON OR CORRECT CARE SOLUTIONS FOR ANY OF THE MEDICAL OR DENTAL CARE EMPLOYEES OR AGENTS. 98 thru 120. All other DAVIDSON COUNTY SHERIFF'S OFFICE OR METRO MEDICAL AGENTS EMPLOYEES OR AGENTS OF THE D.C.S.O.

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?  Yes  No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs VAUGHN HARRIS

Defendants DAVIDSON COUNTY SHERIFF'S OFFICE STAFF and Medical Agents

2. In what court did you file the previous lawsuit? Federal Middle District of Tennessee

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

\* IN STATE COURT I FILED 3 CRIMINAL APPEALS.

3. What was the case number of the previous lawsuit? 3:15cv00356

4. What was the Judge's name to whom the case was assigned? Judge Sharp

5. What type of case was it (for example, habeas corpus or civil rights action)?  
Civil Rights

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) 2015

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? Dismissed For Failure to HAVE Adequate Responses due to inadequate Access time to Law Library Research Materials For Access to Court.

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.)

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit?  Yes  And  No

*(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)*

#### IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

Yes       No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.

Davidson County, Tennessee Downtown Detention Center Prison and Pretrial Jail - 200 James Robertson Parkway, Nashville, TN 37201

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

Yes       No

*(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)*

D. Have you presented these facts to the prison authorities through the state grievance procedure?       Yes       No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? I exhausted the Grievance Process For More than 10 years.

2. What was the response of prison authorities? To Lie and Deny the civil rights violations.

F. If you checked the box marked "No" in question IV.D above, explain why not. N/A

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?       Yes       No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility?       Yes       No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? I mailed A Letter to the Mayor and Governor and Exhausted the Grievance Process of the Sheriff.

57E-1

2. What was the response of the authorities who run the detention facility? They lied and claimed my grievances were false or unsustained.

J. If you checked the box marked "No" in question IV.H above, explain why not. N/A  
N/A

#### V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

My 1<sup>ST</sup> Amendment U.S.C. Right to Adequate Access to Courts. Bounds v. Smith, 430 U.S. 180, (1977)  
And my 8<sup>TH</sup> and 14<sup>TH</sup> Amendment U.S.C. Right to timely medical repair and treatment  
And my 4<sup>TH</sup>, 5<sup>TH</sup>, and 6<sup>TH</sup> Amendment U.S.C. Rights to the U.S. Constitution.

#### VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

I, VAUGHN HARRIS, AM IN JAHNGEMENT DANGER OF PHYSICAL INJURY BY MEDICAL NEGLECT & SO  
 THIS LAWSUIT IS FILED BY I, VAUGHN HARRIS, A NASHVILLE, TN  
 PRISONER OF THE DOWNTOWN PETITION CENTER PRISON UNDER 42 U.S.C.  
 551983 AND 1985 AGAINST THE METROPOLITAN GOVERNMENT OF NASHVILLE  
 AND DAVIDSON COUNTY, TENNESSEE, GOVERNOR BILL LEE, THE TENNESSEE LE-  
 GISLATURE, SHERIFF AARON HALL, AND ALL DAVIDSON COUNTY SHERIFF'S OFFICE STAFF  
 AND MEDICAL AGENTS THAT ASSISTED IN THE VIOLATION OF MY 1<sup>ST</sup>, 2<sup>ND</sup>, 3<sup>RD</sup>, 4<sup>TH</sup>, 5<sup>TH</sup>, 6<sup>TH</sup>, 8<sup>TH</sup>, 14<sup>TH</sup>  
 AMENDMENT U.S. CONSTITUTION RIGHTS. I WAS ENTITLED TO UNDERSIGNED CONSTITUTION LAW.  
 THIS LAWSUIT FILED BY I, VAUGHN HARRIS, AGAINST METRO-NASHVILLE, TEN-  
 NESSEE UNDER 42 U.S.C. 551983 AND 1985 ASK FOR MONETARY DAMAGES AND  
 INJUNCTIVE RELIEF BE GIVEN TO THE PLAINTIFF UNDER 42 U.S.C. 551983 AND 1985  
 FROM THE DEFENDANTS, FOR THE DEFENDANTS DENIAL OF GIVING ME SICK CALL  
 REQUESTED DENTAL AND MEDICAL CARE PROCEDURES TO THE PLAINTIFF DUE TO  
 UNJUST DISCRIMINATION BY THE MEDICAL STAFF, FOR THE DEFENDANTS DENYING  
 TIME AND USE OF LAW LIBRARY MATERIALS, LEGAL ASSISTANCE, AND PRINTOUTS OF CASE  
 WON AGAINST METRO-NASHVILLE IN THE D.C.S.O. STAFF CRIMINAL APPEALS WON AGAINST TENN.  
 FOR ACCESS AND RESPONSE TO COURT, WHICH CREATES A DENIAL OF ACCESS TO COURT IN  
 VIOLATION OF BOUNDS V. SMITH, 430 U.S. 187, 192 (1977) AND LEWIS V. CASEY, 116 S.Ct. 2  
 AND SAUCIER V. KATE, 533 U.S. (2000) 5.

INTRODUCTION OF SUIT WITH JURY DEMANDED

5-21-18

This is a civil rights lawsuit action filed by I, Vaughn Harris, a state prisoner of Nashville, Tennessee, demanding damages of up to \$250,000<sup>00</sup> and injunctive relief under 42 U.S.C. § 1983 and 1985, alleging denial of timely requested medical and dental <sup>REPHR. CARE</sup> and excessive use of force in violation of the 4<sup>TH</sup>, 5<sup>TH</sup>, 8<sup>TH</sup> and 14<sup>TH</sup> Amendments to the United States Constitution and Tennessee state Law.

And also I allege that I was held in R.H.U. unit for ~~more than 2 years~~ under ~~extra punitive confinement segregation~~ and denied ~~adequate~~ ~~TIME~~ ~~use of~~ ~~LAW~~ Library study materials and study time due to ~~METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY~~ staff policy, discrimination, and violation of ~~MY~~ Due Process Clause of the 14<sup>TH</sup> ~~RIGHTS~~ Amendment of the U.S. Constitution. I also allege that all the defendants working in the Davidson County Criminal Justice System conspired in a joint effort to deny me Vaughn Harris, my 1<sup>ST</sup>, 2<sup>ND</sup>, 3<sup>RD</sup>, 5<sup>TH</sup>, 6<sup>TH</sup>, 8<sup>TH</sup>, and 14<sup>TH</sup> Amendment Rights of the U.S. Constitution, that I was entitled to, but was denied by persons working under color of illegal state Law, T.C.A. 29-20-205.

\* Motion Asking the Court For Certification OF THE CLASS \*

in this Lawsuit : THE CLASS Consist of ALL Prisoners HELD IN Davidson County Sheriff's OFFICE RESTRICTIVE Housing Units (R.H.U.) IN Nashville, TENNESSEE Prisons and THE Downtown DETENTION Center PRISON - 4<sup>TH</sup> Floor AND ANY other FLOORS AT the D.D.C. AND ALL Prisoners WHO ARE or will BE CONFINED By the Metropolitan GOVERNMENT of Nashville and Davidson County, TENNESSEE AND the D.C.S.O: Prisons DEPARTMENT - Disciplinary Units

\* I, Vaughn Harris, the plaintiff, AM IN imminent DANGER OF PHYSICAL HARM OR DEATH due to the defendants acts of deliberate MEDICAL NEGLECT and indifference to my MEDICAL Health and DENTAL Health, Federal Court Please Accept this Lawsuit Case

My Copy

The U.S. Federal District Court for the Middle District of Tennessee has jurisdiction over the plaintiff's claims of violation of his Federal U.S. Constitutional Rights under 42 U.S.C. 551983 and 1985, 42 U.S.C. 551331(a) and 1343 and state law tort claims under 28 U.S.C. 51367.

This is a Pro Se <sup>or</sup> CLASS ACTION LAWSUIT CLAIM ACTION filed by I, VAUGHN HARRIS, under 42 U.S.C. 551983 and 1985 against the Metropolitan Government of Nashville and Davidson County, Tennessee and the Davidson County Sheriff's Office staff, employees, and Medical and Dentile Agents, for punitive, compensatory, monetary, and injunctive relief damages for the defendants execution of Nashville municipal policy and law Tenn. Code Annotated 29-20-205 that allows the defendants to violate the plaintiff's 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup>, and 14<sup>th</sup> Amendment Rights of the U.S. Constitution, that the plaintiff's were entitled to, but was denied by persons working under color of state law. The defendants executed these Constitutional violations under Tenn. Code Ann. 29-20-205 law. <sup>that allowed D.C.S.O. medical agents</sup> DENIAL AND DELAY OF URGENT MEDICAL AND DENTILE CARE, <sup>to discriminate and give</sup> MAJ. PRACTICE MEDICAL CARE, DELIBERATE INDIFFERENCE TO DENTILE CARE BY DENYING <sup>the</sup> DENTILE CARE, <sup>and</sup> DENIAL OF MEDICAL REQUESTED AND ALL <sup>DENTILE</sup> EFFECTIVE PREVENTIVE PROCEDURES, DISCRIMINATION OF USE OF <sup>STUDY</sup> LAW LIBRARY TABLET USE, TIME, AND ACCESS AND APPS <sup>W/</sup> PHONE USE TO NON DISCIPLINARY INMATES HELD IN R.H.U., INMATES NOT UNDER D.C.S.O. DISCIPLINARY HENRIN <sup>HEARING</sup> <sup>DISPUNISHED</sup> PUNISHMENT BEING HELD IN R.H.U. AND BEING DENIED EQUAL 7 DAY <sup>W/</sup> LIBRARY ACCESS OF <sup>STUDY</sup> AND INJURY USE OF GENERAL LAPIATION TABLETS, ALLOWED ASSAULT AND BATTERY OF ALREADY BODY CHAINED INMATES BY D.C.S.O. STAFF, MENILE HEALTH STAFF <sup>ALLOWED</sup> TO TORTURE MENILE HEALTH INMATES BY TAKING ALL THEIR STOMES AND PUTTING THEM IN EXTRA GLOVES, INMATES VERBAL REQUEST AND WRITTEN REQUEST FOR MENILE HEALTH CARE ARE DISCRIMINATED AGAINST BY BIAS AND RACIST MENILE HEALTH STAFF, AND ALLOWED THE D.C.S.O. STAFF TO HINDER, ALTER, AND DESTROY PRISONER INMATE PLAINTIFF DOCUMENTS PUT IN D.C.S.O. MAIL TO THE U.S. FEDERAL TENNESSEE COURT ILLEGALLY.

This is a class action lawsuit in action filed by I, Vaughn Harris, in Nashville.

This Lawsuit is filed by I, VAUGHN HARRIS, Pro se under 42 U.S.C. 51983

1. This is a United States Constitution Rights Legal suit claim

ACTION for relief filed by I, VAUGHN HARRIS, A PRO-SE PRE-  
TRIAL prisoner of Nashville, Tennessee from 10-29-2014 to

2023 of today, for \$250,000.00 in PUNITIVE, COMPENSATORY AND  
INJUNCTIVE RELIEF DAMAGES from the defendants. CITY OF NASHVILLE, TENNESSEE, THE

MUNICIPALITY OF THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON  
COUNTY, TENNESSEE, THE DAVIDSON COUNTY SHERIFF'S OFFICE ADMINISTRATOR

AND STAFF, AND ITS MEDICAL CARE AGENTS, CORRECT CARE SOLUTIONS,  
AND ITS MEDICAL STAFF, AND ITS DENTAL AGENTS, DR KRISTAL LEWIS

AND JENNY JAYNES, FOR INJURIES I suffered AND STILL SUFFER DUE  
TO THE DEFENDANT'S WILLFUL, WANTON, GROSS NEGLIGENCE AND  
DENIAL OF (REQUESTED AND PRESCRIBED) EFFECTIVENESS AND  
MEDICAL CARE FROM 10-29-2014 TO TODAY IN 2023, WHICH VIOLATED

MY 8TH AND 14TH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION,  
THAT I WAS ENTITLED TO, BUT WAS DENIED BY PERSONS WORKING

UNDER COLOR OF (NASHVILLE) STATE LAW, TN. CODE ANN. 29-20-205(1)(A)  
THAT VIOLATES THE UNITED STATES CONSTITUTION AND WAS THE MUNICIPALITY

POLICY THAT WAS EXECUTED BY "METRO" AND ITS AGENTS TO CAUSE MY INJURIES  
OF ASSAULT AND BATTERY AND MEDICAL WILLFUL, WANTON, NEGLIGENCE

WHICH REMOVES GOVERNMENTAL ENTITIES (SUIT IMMUNITY UNDER LAW, TENNESSEE  
CODE ANNOTATED 529-20-201(b)(2)). THE U.S. FEDERAL DISTRICT COURT

FOR THE MIDDLE DISTRICT OF TENNESSEE HAS JURISDICTION OVER MY LEGAL  
CLAIMS OF VIOLATIONS OF MY FEDERAL CONSTITUTIONAL RIGHTS UNDER

42 U.S.C. 51983 AND 42 U.S.C. 5198133(1) AND 1343; AND MY STATE LAW  
TORT CLAIMS UNDER 28 U.S.C. 61367. ALL TORT FEASORS ARE BEING SUED

UNDER 42 U.S.C. 51983 IN THEIR OFFICIAL AND INDIVIDUAL CAPACITIES.

2. I, VAUGHN HARRIS, WAS ENTITLED TO MY 8TH AND 14TH AMENDMENT, FEDERAL LAW, STATE  
RIGHTS BY LAW, STATE, AND GOVERNMENTAL ENTITIES.

3. I DEMAND \$250,000.00 BE PAID JOINTLY AND SEVERALLY BY ALL  
TORT FEASORS AND DEFENDANTS THAT ASSISTED AND CAUSED MY PAINFUL  
UNNECESSARY DENTAL AND MEDICAL GROSS NEGLECT AND TORTURE,

## CLAIM FOR RELIEF - SHORT PLAIN STATEMENT - FED.R.CIV.P. Rule 8(a)

The U.S. Federal Court for the Middle District of Tennessee has jurisdiction over the plaintiff's claims of violation of federal constitutional rights under 42 U.S.C. § 1983 and 42 U.S.C. § 1331(1) and 1343, it also has supplemental jurisdiction over the plaintiff's state law tort claims under 28 U.S.C. § 1337.

This is a class action and an individual lawsuit claim action filed by T. Vaughn Harris, and on behalf of all pretrial prisoners injured by the Metropolitan Government of Nashville and Davidson County, Tennessee and the Davidson County Sheriff's Office employees, staff, and agents execution of the municipality's policy, custom, and law, (Tennessee Code Annotated) that caused us injuries ~~and~~ for \$250,000.00 in damages for Harris 29-20-205, from 2014 to today of ~~2023~~ and until these injuries are re-dressed by the court (punitive, compensatory, and injunctive relief damages) under 42 U.S.C. § 1983 to the plaintiff pretrial prisoners, for the defendants <sup>All</sup> ~~plaintiff, 1st, 5th, and 14th~~ <sup>the</sup> deliberate violation of our First, Fifth, and Fourteenth Amendment Rights of United States Constitution, we were entitled to, but were denied by persons working under color of state law. <sup>rights</sup> <sup>and</sup> <sup>entities</sup> ~~rights~~ <sup>and</sup> ~~entities~~ HARRIS IS SUING FOR \$250,000.00, in punitive and compensatory damages from all defendants jointly and severally <sup>and</sup> ~~and~~ <sup>in conjunction with</sup> other class members or merits of this case.

Therefor we the plaintiff seek these damages in demand from the defendants all made parties to the suit: (1) That the CRIMINAL ON HARRIS be ruled time served or dismissed whatever the case number is now. (2) That the defendants immediately arrange a dental referral to a cosmetic dentile doctor or dentile restoration specialist and allow that dentist to repair as much of HARRIS's teeth as possible with root canals, fillings, and replacements due to Dr Lewis's delay. (3) Have all defendants that carried out abuse against pretrial detainee prisoner, VAUGHN HARRIS, pay jointly \$250,000.00 or whatever amount Harris sued for. (4) As punitive and compensatory damages to HARRIS. (4) Release HARRIS from prison or pretrial prison with the monetary damages put on two cashier's checks - one for \$3000.00 and the other for the balance of the court awarded amount <sup>seven</sup> HARRIS as he is released. (5) Order the Federal Government to take over running and supervision of the Davidson County Sheriff's Office prisons for the next 10 years. (6) Award whatever injury damages all other pretrial prisoners are entitled to in conjunction with me, Harris. (7) Expunge all of Harris's disciplinary convictions from the Davidson County Sheriff's Office and its staff. (8) Have the Court use comparative fault principles when making all the defendants pay damages to Harris for the abuse they inflicted against Vaughn Harris or made Harris sustain by neglect, abuse, and torture by omission of medical care or assault and battery.

The U.S. Federal District Court for the Middle District of Tennessee has jurisdiction over the plaintiff's claims of violation of federal constitutional rights under 42 U.S.C. § 1983 and 42 U.S.C. § 1331() and 1343. And this same Federal District Court of Middle Tennessee has jurisdiction over the plaintiff's state law tort claims under 28 U.S.C. § 1337. This suit is filed against all parties execution of law, policy, and custom, Tennessee Code Annotated 29-20-205, against the plaintiff that caused unnecessary injuries and torture and violation of their constitutional rights. <sup>retroactive</sup> This is a CLASS ACTION AND INDIVIDUAL LAWSUIT CLAIM ACTION, filed by I, VAUGHN HARRIS, AGAINST <sup>FOR \$1250,000.00</sup> the <sup>injured</sup> Metropolitan Government of Nashville and Davidson County, Tennessee, from 2014 to today of 2023 and the Davidson County Sheriff's Office <sup>EMPLOYEES of the</sup> PRISON, for compensatory, punitive, and injunctive relief damages under 42 U.S.C. § 1983, for deliberate delay, denial, and neglect of providing timely, requested, prescribed, notified, medical care and law library materials to I, Harris, and other pretrial prisoners in their custody, in violation of our first, fifth, and fourteenth Amendment Rights of the United States Constitution, we were entitled to under the Due Process Clause of the Fourteenth Amendment of the United States Constitution, but were denied by persons and entities working under color of state law. Also we plaintiff's allege and claim torts of assault and battery, <sup>and</sup> deliberate denial and delay of being given medical care by the defendants under municipality policy, custom, and law, <sup>Tennessee Code Annotated</sup> 29-20-205, in violation of our same Due Process Rights of the Fourteenth Amendment of the United States Constitution, we were entitled to, but were denied by persons and entities working under color of state law. <sup>REQUESTED</sup> DAMAGES

Therefore, I, VAUGHN HARRIS, request that the court <sup>GRANT</sup> the following relief to I, Harris: (1) I issue an injunction ordering the defendants to immediately arrange for the plaintiff to be given all restorative dental treatment needed after I, Harris am referred to another cosmetic dentist or dentile agent restoration specialist. (2) I issue an order to have all named defendants guilty of deliberate abuse pay punitive and compensatory damages to the plaintiff of \$1250,000.00 for the physical and emotional damages I sustained from the defendants abuse. (3) Have the Federal United States Government take over the running of this prison for 10 years. (4) Issue an injunction order and declaratory judgment Order stating that my rights were violated by the defendants and that they all (named parties) have to pay all awarded monetary damages jointly and severally to I and other plaintiffs using comparative fault principles to pay as plaintiffs. (5) The Court order that the pending case for me, VAUGHN HARRIS, be dismissed on the grounds of violation of Due Process and illegal injury, torture, and punishment before conviction, case number 2011-D-3475. (6) Award punitive and compensatory damages to all other plaintiffs in relief they are entitled to.

This is A United States Constitution Federal <sup>and</sup> ~~State~~ Prisoner  
RIGHTS Medical and Dentle Injuries LAWSUIT CLAIM ACTION  
FOR RELIEF DAMAGES, filed by I, VAUGHN HARRIS, A Pro Se  
pretrial prisoner of the Metropolitan Government of  
Nashville and Davidson County, Tennessee or the MUNICIPALITY  
Metro. Nashville, TN., from 10-1-2014 to today of 2018, for  
\$250,000.00 in punitive and compensatory and injunctive  
relief damages from the defendants, Metro. Nashville  
and Davidson County, TN, the MUNICIPALITY, the Metropolitan  
Government of Nashville and Davidson County, Tennessee, the Metro  
Davidson County Sheriff's Office staff and administrators, and the Metro  
D.C.S.O. Agents of Medical Care, Correct Care Solutions, and the C.C.S.  
medical staff and dentle agents (Names listed on Next PAGE),  
for unnecessary injuries and assault and battery <sup>GROSS</sup> PAIN AND  
Torture infliction by denial of timely, reasonable, foreseeable,  
and prescribed adequate <sup>TREATMENT</sup> MEDICAL AND DENTLE <sup>CARE BEING GIVEN</sup> to me, HARRIS, by the  
defendants under Metro. Nashville, TN, MUNICIPALITY, (UNCONSTITUTIONAL) policy and  
directive, TENN. Code Annotated 29-20-205(1), (2), (6), that Let the Metro.  
Nashville, TN, MUNICIPALITY and its <sup>DENTLE</sup> MEDICAL AGENTS ignore my (WRITTEN)  
for MEDICAL CARE <sup>TOOTH FILLING</sup> <sup>TEETH</sup> <sup>CAVITY</sup> <sup>CAUSED</sup> <sup>BITTEN</sup> food for  
dentist refuse to fill my cavities, from graved bitten, in D.C.S.O. food for  
4 months until my teeth deteriorated to the nerves, the DR. Krystal Lewis left  
me in dentle pain for 8 months instead of referring me for it requested  
I was suffering unbearable pain and wanted to save my teeth  
Teeth root CANAL, that could be authorized, the correct Care Solutions medical  
staff retaliated against me by conspiring to deny me dentle pain meds  
for 8 months with the Metro. D.C.S.O. Administrator Austin Bodie, ON ANOTHER  
date the C.C.S. medical staff withheld my proscribed high blood pressure  
medication to make me suffer a heart attack, after oral surgery by A  
Hospital dentst-the C.C.S. medical staff refused to give me ANY <sup>DENTLE</sup> PAIN  
medication for a week-<sup>AFTER DENTAL SURGERY AT VANDERBILT</sup> in retaliation for my medical lawsuit against  
Metro. Nashville, TN and its D.C.S.O. Agents and its C.C.S. medical agents.

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I, VAUGHN HARRIS, the plaintiff in this case, have repeatedly exhausted the D.C.S.O. <sup>PRISON AND</sup> grievance appeal procedures when possible to the defendants, but sometimes the defendants withheld <sup>USE</sup> appeal devices by denying us A.H.U. held inmates (<sup>EQUAL TO THE LIBRARY</sup> and <sup>GRADUATE</sup> book) from 7-21-2020 until today in 2023. The defendants in this lawsuit are: The Metropolitan Government of Nashville and Davidson County, Tennessee, Governor Bill Lee, the Nashville, Tennessee Legislature, Sheriff Daron Hall, <sup>⑤</sup> Austin Bodie, <sup>⑥</sup> Thomas Conrad, <sup>⑦</sup> Granvisse Earl, <sup>⑧</sup> Beth Gentry, <sup>⑨</sup> Carla Joseph, 98th <sup>130</sup> MEDICAL AGENTS AND <sup>AND</sup> ADMINISTRATIVE STAFF of the Davidson County Sheriff's Office and its Medical Agents and Dentist from 2014 until today of 2023. (Because the defendants <sup>REMOVED</sup> <sup>MY</sup> NAME <sup>OFF</sup> <sup>MY</sup> BADGES IN A <sup>CONTRACTED</sup> <sup>order</sup> to <sup>RE</sup> <sup>MY</sup> MEDICAL CARE AND <sup>LIBRARY</sup> <sup>OF RESEARCH</sup> LAWSUIT from 2014 until today of 3-11-2023).

I, HARRIS, put a 60 plus page Lawsuit into the DAVIDSON  
County Sheriff's OFFICE <sup>IN DOWNTOWN DETENTION CENTER</sup> MAIL Box in March of 2022 and  
AN AMENDED suit in April 2022, sueing the Above NAMED persons  
and the Metropolitan Government of Nashville, TENNESSEE <sup>AND IT'S  
DOWNTOWN COUNTY AND  
AGENCIES</sup> AND ITS  
AGENCIES  
IN THE LAWSUIT, but these defendants were Never  
NAMED by the Courts in the Lawsuits filed to the Court  
Because the Lawsuits I, VAUGHN HARRIS, placed in the D.C.S.O.  
MAILBOX in March, April, and May of 2022 to the U.S. Federal  
Court of Tennessee Middle District were Altered, AMENDED,  
AND destroyed by the D.C.S.O. staff under Tenn. Code Ann. 29-10-  
205, in order to cause injury <sup>AND</sup> DISMISSAL of my Non Privolous  
Lawsuit claim, and to hinder <sup>deny</sup> and impede my access to the Court.  
Which violated my 1<sup>ST</sup>, 4<sup>TH</sup>, 5<sup>TH</sup>, 8<sup>TH</sup>, AND 14<sup>TH</sup> Amendment Rights of the U.S. Constitution,  
I was entitled to, but was denied by persons working under color  
of state law. An actual injury occurs where the effort of a prisoner to pursue  
nonfrivolous legal claim was hindered or prevented from litigating a <sup>LEGAL</sup> <sup>NONFRIVOLOUS</sup> CASE. Lewis

Supreme Court case, Lewis v. Casey, 116 S.Ct. 2174, 2179 (1996)<sup>(4)</sup>, stated that a prisoner must show a denial of access to court, not a denial of access to a law library or legal assistance, in order to claim a denial of court access. Also a prisoner could show that the inadequacies in the prison's law library or assistance program or assistance<sup>LAW LIBRARY HELP OR ASSISTANCE</sup> hindered his efforts to pursue a legal claim and an actual injury resulted.<sup>(4)</sup> (5) Or an actual injury occurs where the effort of a prisoner to pursue a non-trivial<sup>NON-TRIVIAL</sup> claim was hindered or has been frustrated or was impeded by the defendants or the municipality<sup>Prisoners, Prison, Person, Bent</sup> by access to the Federal Court,<sup>(5)</sup> or (6) if a prisoner's complaint is dismissed because the individual was unable to research pleading requirements or unable to file a complaint or a<sup>mailed</sup> nontrivial<sup>NON-TRIVIAL</sup> complaint, a hindrance has occurred.<sup>(7)</sup> Some Courts<sup>(8)</sup> assume that only dismissal or inability to file nontrivial<sup>NON-TRIVIAL</sup> complaints satisfies the injury requirement, Lewis v. Casey, 116 S.Ct. (5) at 2180, (6) at 2181, (7) at 2189, (8) Davis v. Milwaukee Co. 225 F. Supp.2d<sup>967</sup> (E.D. Wis. 2002).

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Since 2011 through up to today March 18, 2023 and on going currently this instant I, inmate prisoner, VAUGHN HARRIS, have been denied effective timely medical and dentile treatment and repair of my sick call/ requested serious medical needs by DAVIDSON COUNTY Sheriff's Office Medical and Dentile CARE contracted staff agents for inmate pretrial and post trial prisoners. because of these D.C.S.O. Medical Agents execution of Nashville, Tennessee law and D.C.S.O. policy and custom T.C.A. 29-20-205. All of the denied medical care and dentile repair care D.C.S.O., C.C.S., sick call request, and D.C.S.O. grievances and appeals to the denied sick calls, and the Medical and Dentile (Dr. <sup>Doctor of</sup> Diagnosis) of my serious medical needs is documented in the D.C.S.O. defendants computer files and the Medical and Dentile Agents For the D.C.S.O. (Correct CARE Solutions, Dr Krystal Lewis, Dr B & Name Unknown, Dr Africa & Full Name Unknown, Dr. <sup>name</sup> Unknown etc...) paper and computer files.

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(5) The institution or prosecution of any judicial or administrative proceeding, even if malicious or without probable cause;

(6) Misrepresentation by an employee whether or not such is negligent or intentional;

(7) Or results from riots, unlawful assemblies, public demonstrations, mob violence and civil disturbances;

(8) Or in connection with the assessment, levy or collection of taxes; or

(9) Or in connection with any failure occurring before January 1, 2005, which is caused directly or indirectly by the failure of computer software or any device containing a computer processor to accurately or properly recognize, calculate, display, sort, or otherwise process dates or times, if, and only if, the failure or malfunction causing the loss was unforeseeable or if the failure or malfunction causing the loss was foreseeable but a reasonable plan or design or both for identifying and preventing the failure or malfunction was adopted and reasonably implemented complying with generally accepted computer and information system design standards. Notwithstanding any other law, nothing in this subdivision (9) shall in any way limit the liability of a third party, direct or indirect, who is negligent. Further, a person who is injured by the negligence of a third party contractor, direct or indirect, shall have a cause of action against the contractor.

\* TENNESSEE LAW ~~IN~~ Code Ann. 929-20-205(2) CLAIMS THAT <sup>2 of 2</sup>  
INJURIES THAT ARISE OUT OF CIVIL RIGHTS VIOLATIONS CARRIED  
OUT BY ITS STAFF AND EMPLOYEES AND AGENTS IS LEGAL AND  
THAT ALL THESE PERSONS AND GOVERNMENTAL ENTITIES ARE  
IMMUNE TO THE RIGHTS OF THE UNITED STATES CONSTITUTION FOR  
CITIZENS OF TENNESSEE, WHICH IS A LIE AND UNCONSTITUTIONAL.  
THIS GOVERNMENT POLICY INFILCTED MY INJURIES BY ITS AGENTS EXECUTION  
OF THIS UNCONSTITUTIONAL POLICY AND CUSTOM.

[A] local government may not be sued under § 1983 for an injury inflicted solely by its employees or agents. Instead, it is when execution of a government's policy or custom, whether made by its lawmakers or by those whose edicts or acts may fairly be said to represent official policy, inflicts the injury that the government as an entity is responsible under § 1983.

UNCONSTITUTIONAL  
GOVERNMENT  
LAW  
AND  
POLICY

20-20-205(2)

A municipality is not liable under § 1983 for [\*\*9] injuries inflicted solely by its employees or agents, and the doctrine of respondeat superior is inapplicable to § 1983 actions. *Id.* at 694-695. "It is only when the execution of the government's policy or custom ... inflicts the injury that the municipality may be held liable under § 1983." *City of Canton v. Harris*, 489 U.S. 378, 385, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989) (citation omitted).

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The defendants, the Metropolitan Government of Nashville and Davidson County, Tennessee and its employees and agents, adopted and executed law, policy, and custom, Tennessee Code Annotated 29-20-205, (legalized abuse of pretrial prisoners in the municipality's custody) to inflict harm, punishment, and injury to us (Nashville, Tennessee pretrial prisoners) in ANY MANNER OF abuse of discretion by it and its employees and its agents under the municipality's policy, custom, law, and direction. Which was the moving force behind the municipality's and its employees and agents deliberate indifference to our pretrial prisoner health and safety and caused the medical agents to carry out assault and battery by medical care delay, neglect, and denial of medical care and wanton unnecessary injury and infliction of pain on us plaintiffs. The municipality's Agents and employees of the Davidson County Sheriff's Office Also used law (Tenn. Code Ann. 29-20-205) to withhold equal use of legal representation to adequate Federal Law Library materials to us pretrial prisoners from 2015 to 2019, so we could not file a nonfrivolous lawsuit complaint and redress and respond to the Court in a meaningful timely manner with adequate legal council. The plaintiffs seek to hold the City of Nashville, Tennessee and its employees and medical care agents liable for injuries caused by it and its agents and employees execution of policy, custom, and law (Tenn. Code Annotated 29-20-205) against (pretrial prisoners) of City of Nashville, Tennessee that suffered injuries due to violations of these plaintiffs Due Process Clause rights and violations of their 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendment Rights of the United States Constitution, by persons working under color of state law of Nashville, Tennessee from 2015 until today of 2019 and possibly into the future. Local governing bodies can be sued under 42 U.S.C. § 1983 only where "the action that is alleged to be unconstitutional implements or executes a policy statement, ordinance, regulation, or decision officially adopted and promulgated by that body's officers, agents, or employees and the municipality, or is visited pursuant to governmental custom even though such a custom has received formal approval through decision making channels, *Monell v. Department of Social Services*, 436 U.S. 658, 698-91, 985. Ct. 2018, 56 L. Ed. 2d 611 (1978)." A municipality can be liable under 42 U.S.C. § 1983 only where its policies are the moving force behind the constitutional violation "and there is a direct causal connection between the policy, custom, or law of the city and the constitutional injury to the plaintiffs. *HARRIS* (quoting *City of Canton v. HARRIS*, 489 U.S. 378, 389, 103 L. Ed. 2d 412, 1095. Ct. 1197 (1989)).

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The MUNICIPALITY of Metropolitan Nashville and Davidson County, Tennessee's adoption of the city's official policy, custom, and law, Tenn. Code Ann. 29-20-205(2)+(1) is an illegal legislative enactment of law that claims that governmental employees of medical care are allowed to ignore or violate inhabitants of Nashville, TN civil rights or federal laws U.S. 8th and 14th Amendment Rights of the United States Constitution, I was entitled to, but was denied by persons working under color of Tenn. Code Ann. 29-20-205(1)+(2)+(6), Metro, Nashville, TN. state law. It is only when the execution of the government's policy or custom inflicts the injury that the municipality may be held liable under 42 U.S.C. §1983, City of Canton, Ohio v. HARRIS, 489 U.S. 378, 385, 103 L.Ed.2d 412, 1075. Ct. 1197 (1989) (citation omitted). All the unnecessary injuries I, HARRIS suffered and sustained from Metro. And its agents were a direct result of Metro, Nashville, TN official municipal policy and custom and law Tenn. Code Ann. 29-20-205(1), (2), and (6), used by these (MEDICAL) AGENTS to deny me MEDICAL CARE, by the discretionary (ABUSE) clause, 29-20-205(1) and the civil rights immunity clause, (2) of 29-20-205, that they knew I needed, but refused to give me for the very purpose of causing me, HARRIS, AND OTHERS on ASSAULT and battery by DELIBERATE NEGLIGENCE, with the knowledge that HARM would result, even though they all knew I HAD A SUFFICIENTLY serious medical need while (INCARCERATED) FARMER v. BRENNAN, 511 U.S. 825, 837, 128 L.Ed.2d 811, 114 S.Ct. 1970 (1994) and showing the prison medical staff possessed a sufficiently culpable state of mind in denying me medical care for the very purpose of (CAUSING HARM) or with the knowledge (INJURY OR HARM WILL RESULT) (quoting FARMER 511 U.S. AT 834, 835) THE ACT OF DELIBERATE INDIFFERENCE BY PRISON OFFICIALS TO (INMATES / DETAINees) serious medical needs constitutes UNNECESSARY AND WANTON INFILCTION OF HARM IN VIOLATION OF THE 8TH AND 14TH AMENDMENTS DUE PROCESS CLAUSE / PROCESS CLAUSE / (PROHIBITION AGAINST CRUEL AND UNUSUAL PUNISHMENT) ESTELLE v. GAMBIE 429 U.S. 97, 104, 50 L.Ed.2d 251, 97 S.Ct. 285 (1976) MOLTON v. CITY OF CLEVELAND 839 F.2d 240, 243 (6th Cir. 1988) where any person acting under color of state law abridges rights secured by the Constitution or United States laws, including a detainees 8th and 14th Amendment rights §1983 provides civil redress, City of Canton, Ohio v. HARRIS, 489 U.S. 378, 388-89, 103 L.Ed.2d 412, 1075. Ct. 1197 (1989)

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Because the municipality, the Metropolitan Government of Nashville and Davidson County, Tennessee adopted a policy, custom, and law (Tenn. Code Ann. 29-20-205), that caused our plaintiff's mistreatment AND was the moving force behind the constitutional violations inflicted upon us pretrial prisoners of Nashville from 2015 to 2019 of today, the municipality (and its agents) can be liable under 42 U.S.C. § 1983 only where its policies are the moving force (behind) the constitutional violation. City of Canton v. Harris, 489 U.S. 378, 389, 103 L.Ed.2d 412, 109 S.Ct. 1197 (1989) (quoting Monell v. New York City Dept. of Social Services, 436 U.S. 658, 649, 56 L.Ed.2d 611, 783, 17, 2018 (1978)). The policy, custom, and law (Tenn. Code Ann. 29-20-205) abuse) adopted, authorized, and made executed by the Metropolitan Government of Nashville and Davidson County, Tennessee and its agent employees and agent medical contractors and staff under the municipality's direction to cause our plaintiff's injuries from deliberate indifference, actions of the municipality and its agents, abuse, that caused constitutional violations of rights entitling to us pretrial prisoner detainees of Nashville, Tennessee from 2015 to today of 2019, the persons working under color of state law. A municipality can be liable for failure to train, supervise, or discipline its law enforcement employees and agents for acts or inactions that constitute a policy or custom of deliberate indifference to pretrial and prisoner's health or safety that cause injuries in violation of the Fourteenth and Fifteenth Amendment United States Constitution Rights under 42 U.S.C. § 1983. Sharpe v. City of Lewisburg, Tenn., 677 F. Supp. 1362, 1368 (M.D. Tenn. 1988) and Letch v. Shelby County Sheriff, 891 F.2d 1241 (6th Cir. 1989). It is possible that a city or municipality may be held liable in conjunction with its employees and agents for execution of decisions carrying out the municipality's (policy, custom, or law) that (condones) deliberate indifference to pretrial prisoners' serious medical needs or their punishment, in the Due Process Clause of the plaintiff's 1st, 4th, 8th, and 14th Amendments of the United States Constitution were violated by the municipality and its employees and agents, the defendants, under municipality state law. The touchstone of a 42 U.S.C. § 1983 action against a government body is an allegation that official policy or law is responsible for the state and agents and municipality deprivations of rights protected by the Constitution. This (NASHVILLE TN) policy or abuse of constitutional law) was executed against us pre-trial prisoners (of the City of Nashville) to violated our 1st, 4th, 8th, and 14th Amendment Rights of the United States Constitution and injured our health and violated the statute of limitations of prosecution of their abuse by impeding access to the Court by withheld adequate legal materials from us plaintiffs for years from 2015 until today of 2019 under Tenn. Code Ann. 29-20-205 by the metropolitan municipality and its employees.

(D.C.S.O. = DAVIDSON COUNTY SHERIFF'S OFFICE)

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VII. Relief Requested Immediately From The Federal Court:

- (1) Court Order that prisoner, VAUGHN HARRIS - 578087, be given a D.C.S.O. LAW and Entertainment Tablet with all the Apps that general population inmates are allowed and order he be given 365 day use of that Tablet 24 Hours a day (except when the Tablet is being recharged one day out of the 7 days in a week).
- (2) Court Order that prisoner, VAUGHN HARRIS, be sent to an outside of prison dental care cosmetic and implant dentist to receive dental debridement, dental fillings, dental root canals, dental crowns, and dental teeth replacements at SAME DAY SMILES.COM or Clear Choice Dental.
- (3) Court Order that VAUGHN HARRIS be given (2 days for 1 day served sentence) on and in his sentenced time served and to be served due to the defendants denial of Harris's 1<sup>ST</sup>, 4<sup>TH</sup>, 5<sup>TH</sup>, 6<sup>TH</sup>, 8<sup>TH</sup>, 11<sup>TH</sup> Amendment Rights of the U.S. Constitution that he was entitled to, but was denied by persons working under color of Tennessee state law in violation of Harris's Due Process Rights.
- (4) Court Order the D.C.S.O. Sheriff and Head Administrative Assistant, Warden Thomas Conrad to appoint a Law Librarian or a D.C.S.O. Case Manager to make computer (printouts) of the Case Law stored on the D.C.S.O. Law Library Tablet if written, verble, or digital requested by ANY prisoner's of ANY Nashville, Tennessee prison.
- (5) Court Order the D.C.S.O. Sheriff and the D.C.S.O. Food Buyer and STAFF to provide real pasteurized homogenized cow 2% Reduced Fat Milk to all D.C.S.O. inmates on Kosher diets every day at Breakfast with Cereal for the next 14 years from 2023 to 2037.
- (6) Court Order the D.C.S.O. Sheriff to have the D.C.S.O. LAW LIBRARIAN and Case Manager Supervisor (Gravisse EARL) to put all Federal Civil Lawsuits won by Tennessee prisoners or persons against the D.C.S.O. STAFF for the Metropolitan Government of Nashville and Davidson County, Tennessee.
- (7) Court Order that the D.C.S.O. Sheriff or Gravisse Earl to give inmate VAUGHN HARRIS the Full Names and STAFF positions of all D.C.S.O. guards and

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⑧ Court Order that the defendants and the D.C.S.O. Sheriff Daron Hall order GRANVILLE EARL and Law Librarian Mrs Bourne and the Educational Director of the D.C.S.O. and the Securus Tablet Agent programer to put all of the INMATE WON ANY or CIVIL CASES (unpublished) LAWSUITS WON AGAINST ~~THE D.C.S.O. AND D.C.S.O.~~ TENNESSEE GOVERNMENT, Tennessee Medical and Dentile Agents, Nashville, Tennessee D.C.S.O. staff or Medical Agents From date 1-1-1984 to 2023 on the Securus Law Library Tablet immediately under the Freedom of Information Act of the U.S.A., Also order that (INMATES) be Allowed paper printouts of these cases CASE LAW by verble or written request or digital Tablet request, and have put on the LAW LIBRARY Tablet instructions on how to file Habeas Corpus Petitions and Examples of some filed and won by Tennessee or other state prisoners for Due Process Violations,

⑨ Court Order A Federal Investigator to examine the Law Library Research Tablets use of time for inmates housed in the entire D.C.S.O. - Downtown Detention Center Prison

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VII.  D.C.S.O. = DAVIDSON COUNTY SHERIFF'S OFFICE PRISON & BELOW

RELIEF REQUESTED: State exactly what you want the Court to order each defendant to do for you. I Request THE Federal Court Judge to

- ① Court Order the defendant(s) to Alter the T.C.A. Law 29-20-205 use,
- ② Court Order the D.C.S.O. Sheriff and all his D.C.S.O. STAFF to allow inmates held in R.H.U. but are Not under Disciplinary Hearing Extra Punishment to be Allowed 7day A Week All Apps Tablet use in their cells,
- ③ Court Order that All inmates held in D.C.S.O. R.H.U. units be allowed 4 Hour 3 day A Week use of the Law Library Tablet and the radio App and case law printouts if the tablets caselaw by the Law Librarian, Educational director, or Case Manager, and be given paper if the tablets caselaw by the Law Librarian, Educational director, or Case Manager, and
- ④ Court Order the D.C.S.O. SHERIFF, BARRY HALL AND the D.C.S.O. MEDICAL CARE Supervisor to immediately get the D.C.S.O. Medical STAFF to give inmate VAUGHN HARRIS 98865 I request a jury trial.
- ⑤ Court Order the D.C.S.O. MEDICAL AGENT Doctor to give VAUGHN HARRIS the correct Blood Pressure medicine regiment of Lipricil in the morning and Lipricil in the evening as needed,

VIII. CERTIFICATION in the morning and Lipricil in the evening as needed,

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Vaughn Harris Date: MARCH 14, 2023  
 Prison Id. No. 578087  
 Address (Include the city, state and zip code.): Downtown Detention Center Prison,  
 P.O. Box 196383, Nashville, TN 37219-6383

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Prison Id. No. \_\_\_\_\_  
 Address (Include the city, state and zip code.): \_\_\_\_\_

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT**, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS**, if not paying the civil filing fee.

**SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER.**  
 Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.